

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
QUALCOMM Incorporated	)	WT Docket No. 05-7
	)	
Petition for Declaratory Ruling	)	

To: The Commission

**REPLY COMMENTS OF WWWB-TV, INC.  
TO THE PETITION FOR DECLARATORY RULING  
OF QUALCOMM INCORPORATED**

WWWB-TV, Inc.<sup>1</sup>, as the licensee of WWWB-TV located on Channel 55 serving the Charlotte, North Carolina television market, joins the Association of Maximum Service, Inc. (“MSTV”) and the National Association of Broadcasters (“NAB”) in urging the Federal Communications Commission (“the Commission”) to uphold the television interference standards in Section 27.60 of its rules and dismiss the Petition for Declaratory Ruling filed by QUALCOMM Incorporated (“QUALCOMM”). Subjecting Charlotte area over-the-air viewers to a new two percent interference standard would be inconsistent with the Commission’s previous position of promoting free over-the-air television. As a result, QUALCOMM’s proposal is contrary to the public interest on its face.

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<sup>1</sup> WWWB-TV, Inc. is a wholly-owned subsidiary of Capitol Broadcasting Company, Inc., Raleigh, North Carolina. WWWB-TV’s community of license is Rock Hill, South Carolina, which is a part of the Charlotte, North Carolina Designated Market Area.

WWWB-TV concurs with both the comments and reply comments filed jointly by MSTV and NAB. Accordingly, the Commission should dismiss QUALCOMM's Petition, or, in the alternative, treat it as a Petition for Rulemaking.

Respectfully submitted,

/s/ Dianne Smith

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